

UNITED STATES DISTRICT COURT
for the Central District of California

United States of America

v.

Tyrie Contreras and,
Kenyon Watson

Defendants

FILED CLERK, U.S. DISTRICT COURT
9/4/2024
CENTRAL DISTRICT OF CALIFORNIA BY: _____ D.C. DEPUTY

Case No. 5:24-mj-00366

LODGED CLERK, U.S. DISTRICT COURT
09/04/2024
CENTRAL DISTRICT OF CALIFORNIA BY: _____ AP DEPUTY

**CRIMINAL COMPLAINT BY TELEPHONE
OR OTHER RELIABLE ELECTRONIC MEANS**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. In the county of San Bernardino, in the Central District of California, the defendants violated the follow statutes on or about the following dates:

<i>Code Section</i>	<i>Offense Description</i>	<i>On or about:</i>	<i>Defendant:</i>
18 U.S.C. §§ 1951(a)	Interference with Commerce by Robbery	August 9, 2024	Tyrie Contreras and Kenyon Watson
18 U.S.C. § 924(c)	Use, Carry, or Brandish a Firearm in Furtherance of a Crime of Violence	August 9, 2024	Tyrie Contreras
18 U.S.C. § 922(g)(1)	Felon in Possession of Firearm	August 23, 2024	Tyrie Contreras

This criminal complaint is based on these facts: *Please see attached affidavit.*

Continued on the attached sheet.

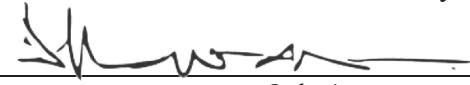
/s/ Pursuant to Fed. R. Crim. P. 4.1
Complainant's signature

Jarrett Keegan, Special Agent

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: 9/4/2024


Judge's signature

City and state: Los Angeles, California

Hon. Shashi H. Kewalramani, U.S. Magistrate Judge
Printed name and title

AUSA: Peter Dahlquist

AFFIDAVIT

I, Jarrett Keegan, being duly sworn, declare and state as follows:

PURPOSE OF AFFIDAVIT

1. This affidavit is made in support of a criminal complaint and arrest warrant for Tyrie CONTRERAS ("CONTRERAS") for violations of 18 U.S.C. §§ 1951(a) (Interference with Commerce by Robbery) and 924(c) (Use, Carry, or Brandish a Firearm in Furtherance of a Crime of Violence) which occurred on August 9, 2024, and a violation of 18 U.S.C. § 922(g)(1) (Felon in Possession of a Firearm) which occurred on or about August 23, 2024.

2. This affidavit is also made in support of a criminal complaint and arrest warrant for Kenyon WATSON ("WATSON") for a violation of 18 U.S.C. §§ 1951(a) (Interference with Commerce by Robbery) which occurred on August 9, 2024.

3. The facts set forth in this affidavit are based upon my personal observations; my training and experience; and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and arrest warrants and does not purport to set forth all of my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and part only.

BACKGROUND OF AFFIANT

4. I am a Special Agent ("SA") with the United States Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF") in San Bernardino, California. I joined ATF in July 2014. Before becoming an ATF SA, I was a Federal Air Marshal with the Federal Air Marshal Service for seven years. During my career in federal law enforcement, I have received extensive training regarding federal criminal law. My education includes a Bachelor's Degree in Aerospace Studies from Embry Riddle Aeronautical University and a Master's Degree in Security Management from American Military University.

5. As an SA, I have completed training at the ATF National Academy and the Federal Law Enforcement Training Center related to federal firearms and narcotics laws and regulations. I regularly refer to these laws and regulations during the course of my duties and have written and participated in the execution of numerous search and arrest warrants for violations of these statutes. During my career in the field, I have participated in the investigation, surveillance, and arrest of numerous prohibited persons in possession of firearms, as well as firearms and narcotics traffickers, and persons engaged in crimes of violence such as robbery, carjacking, attempted murder, and murder.

SUMMARY OF PROBABLE CAUSE

6. On the afternoon of August 9, 2024, three masked suspects conducted a takeover-style robbery of a San Bernardino marijuana dispensary. After passing through the lobby of the

dispensary, CONTRERAS and a currently unidentified masked male suspect made their way to the dispensary's main showroom. Both CONTRERAS and the currently unidentified man held silver and black semiautomatic pistols in their hands. Entering the showroom, the two gunmen ordered three female employees behind the counter to the ground, with the unidentified suspect racking his pistol and ejecting a 9mm round to the showroom floor before moving behind the counter. CONTRERAS then climbed over a glass display case and pressed the barrel of his pistol to the head of one of the employees, who at that point, was lying on the floor with her face down.

7. While CONTRERAS and the unidentified suspect were in command of the showroom, WATSON remained in the lobby with a fourth female employee who had gone to the ground as soon as the three robbers had entered the dispensary. WATSON took a cell phone out of the employee's hands before rummaging through the lobby desk. WATSON then threw a tablet and radio away from the employee's reach, before joining the other two suspects in the next room.

8. In the showroom, with the three female employees still lying face down on the ground, CONTRERAS, WATSON, and the other unidentified suspect stole marijuana product from glass display cases and from racks on the wall, before taking cash from the register and cell phones from the employees.

9. After finding the safe, CONTRERAS forced one of the female employees up from the ground and moved her to the room with the safe, all while pointing his firearm at her back.

WATSON then forced the female employee from the lobby to the showroom, where she joined the others on the ground. Unable to open the safe in the back room, WATSON then pushed the safe out and across the showroom floor to the lobby, before leaving the dispensary just briefly to put his backpack in the BMW and communicate with the getaway driver outside. WATSON then returned inside to grab more marijuana product with the two others.

10. As the three robbers then made their exit out the front door of the dispensary, two uninvolved vehicles arrived in the dispensary parking lot. After loading the safe into the back seat of WATSON's white BMW sports sedan, the unidentified suspect pointed his firearm at both vehicles, just as WATSON assisted CONTRERAS with the loading of stolen merchandise into the trunk of the BMW. All three then got into the BMW and sped away before police arrived.

11. The license plate of WATSON's white BMW 3 series sedan was captured on surveillance video at the dispensary. The vehicle was linked to commercial license plate reader hits at WATSON's parole address in Perris, California. On the day of the robbery, license plate readers captured the BMW as it traveled from Perris to San Bernardino. Call detail records associated with the cell phone number WATSON provided to his parole officer showed communications with the cell phone number CONTRERAS provided to his parole officer. Two phone calls between the two numbers occurred less than 90 minutes before the robbery. WATSON's social media account included multiple photos

of WATSON's BMW as well as the shoes and backpack used by WATSON during the robbery.

12. CONTRERAS was arrested by Colton Police Department on August 23, 2024, following a home invasion robbery and lengthy vehicle pursuit, which ended with CONTRERAS crashing the victim's stolen vehicle. CONTRERAS fled on foot, tossing a grey Nike Air Jordan branded backpack before finally being apprehended. The backpack was searched and found to contain a loaded silver and black Smith and Wesson SD40 VE .40 caliber pistol. The firearm and the backpack matched those on surveillance video in CONTRERAS' possession during the dispensary robbery on August 9, as did the pants CONTRERAS was wearing when he was taken into custody. Additional evidence linking CONTRERAS to the dispensary robbery was identified during a review of CONTRERAS' social media.

13. Investigators have not yet identified the getaway driver or the third suspect who racked his pistol during the dispensary robbery.

STATEMENT OF PROBABLE CAUSE

14. The following summary of the investigation is based upon my conversations with other law enforcement officers, my review of police reports, surveillance and witness videos, body worn camera ("BWC") footage, and other materials, as well as my own knowledge of the investigation.

A. Robbery of Marijuana Dispensary on August 9, 2024

15. On August 9, 2024, at approximately 4:07 p.m., San Bernardino Police Department ("SBPD") dispatchers received a

report of an armed robbery which had just occurred at Tree Factory, a marijuana dispensary located at 654 S. Lincoln Ave. in San Bernardino, California. Patrol units responded to the scene, but the suspects fled prior to the officers' arrival. Patrol officers interviewed victims and witnesses and collected surveillance and witness video.

16. A review of the dispensary's surveillance video showed at approximately 4:01 p.m., a white 2007 BMW 3 series sedan, with California license plate 8ROM975, traveled north on S. Lincoln Ave., a short cul-de-sac commercial street south of downtown San Bernardino. The BMW turned into the parking lot of Tree Factory, a marijuana dispensary which occupied the northeast corner of a non-descript commercial building. The dispensary's glass front doors faced north to the parking lot, with metal security bars covering the doors and surrounding windows. Above the front doors was a large black sign displaying the business name.

17. The BMW traveled west and pulled into a spot in the northwest corner of the lot, before backtracking east in front of the dispensary front doors. The dispensary's exterior surveillance cameras, which faced the parking lot, captured the heavily damaged rear door on the passenger side of the BMW sedan. The BMW then stopped on the concrete apron and then backed up, reversing into the second parking spot inside the lot, just outside the front doors of the dispensary.

18. Just a few seconds after the BMW came to a stop, the rear driver's side door and front passenger side door opened at

about the same time, with two hooded and masked suspects then sprinting to the front door of the business. The suspect from the front passenger seat, thus far unidentified (further referenced as "unidentified suspect"), was the first to enter the business. He appeared to be an adult male, wearing black shoes with a metallic accent near the toe box, black socks, black shorts, and a black hoodie with a yellow design on the front. The unidentified suspect wore light colored grey or green gloves and had an object resembling a silver and black Smith and Wesson SD series pistol in his left hand.

19. Entering the dispensary behind the unidentified suspect in the black shorts was a suspect later identified as WATSON, who had exited the rear driver's side door of the BMW. WATSON wore white high top Nike Air Jordan sneakers with red bottoms and white soles. He also wore dark colored jeans with a faded front, a white hoodie with "POLO" written across the chest, and black Franklin batting gloves with white accents. WATSON carried a black backpack with a screen print of open shark mouth on the lower portion of the bag. The backpack was unzipped and the red inside liner was visible on the video.

20. Following WATSON from the BMW through the dispensary doors was a suspect latter identified as CONTRERAS, who wore black athletic shoes, black pants, a black hoodie, and black Franklin batting gloves with gold accents. CONTRERAS' black pants had the word "RUTHLESS" written across the crotch in large bold white letters with a red outline. On the back of the left pant leg was a logo with a large red "R" and "1991." CONTRERAS

carried a grey backpack with the red Nike Air Jordan logo embossed on the back. CONTRERAS carried an object resembling a silver and black Smith and Wesson SD series pistol in his right hand as he entered the dispensary. The driver of the BMW remained inside the vehicle and out of sight of the surveillance cameras throughout the robbery.

21. Seeing the three masked and armed men entering the business, a female employee immediately hid behind a receptionist desk located in the dispensary's lobby. The unidentified suspect and CONTRERAS then bypassed the employee, accelerating their movement and sprinting down the hallway past the frightened lobby employee towards the dispensary's showroom. As they did so, their firearms were out in front of them. WATSON remained in the lobby and went around the desk toward the employee, who momentarily began to get up and grab her phone from the desk as WATSON removed it from a charger. WATSON then ripped it away from the employee's outstretch hands, before taking off to join the others in the showroom.

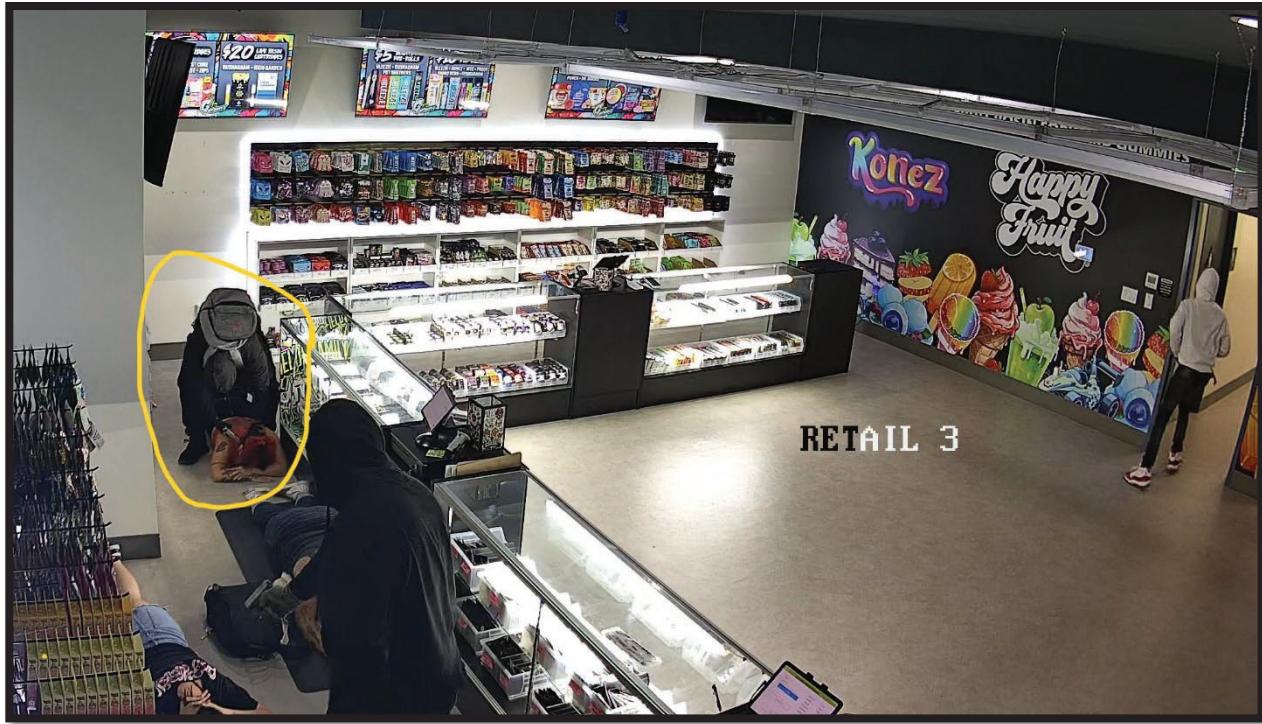
22. A few seconds later, WATSON returned, causing the employee to appear scared as the employee who was still down behind the desk. WATSON then ransacked the drawers in the desk before throwing a tablet and walkie talkies across the room. As this was occurring, an unidentified customer in a pickup truck arrived in the parking lot. The customer then momentarily opened the door to the dispensary, but fled after seeing WATSON.

23. Inside the showroom, before the two gunmen ran in from the lobby, three female employees were casually standing behind

glass display cases which were positioned on the south and west walls of the dispensary. Once the suspects entered the lobby, all three women started moving toward a back hallway behind the southern display case. The unidentified suspect was the first gunman to enter the room. He had his weapon out in front of him in his right hand and pointed it in the direction of two of the employees. The pistol appeared to have a weapon mounted light or laser affixed beneath the pistol frame.

24. As the unidentified suspect approached the southern counter, he racked the weapon, ejecting a live 9mm round from the pistol. The round was not found until the following day, when employees of the dispensary found it concealed behind a counter door.

25. Entering the showroom room behind the unidentified suspect was CONTRERAS, with his pistol outstretched in front of him and pointing it at the third employee in the room. The unidentified suspect then moved behind the counter, and began standing over two of the employees, before CONTRERAS flipped over a glass display case around the time WATSON first briefly entered the showroom. After CONTRERAS was behind the counter, he immediately pressed his firearm to the head of the third employee, still face down to the floor. I have included a cropped surveillance screenshot below, capturing this moment during the robbery and highlighted in the yellow circle:

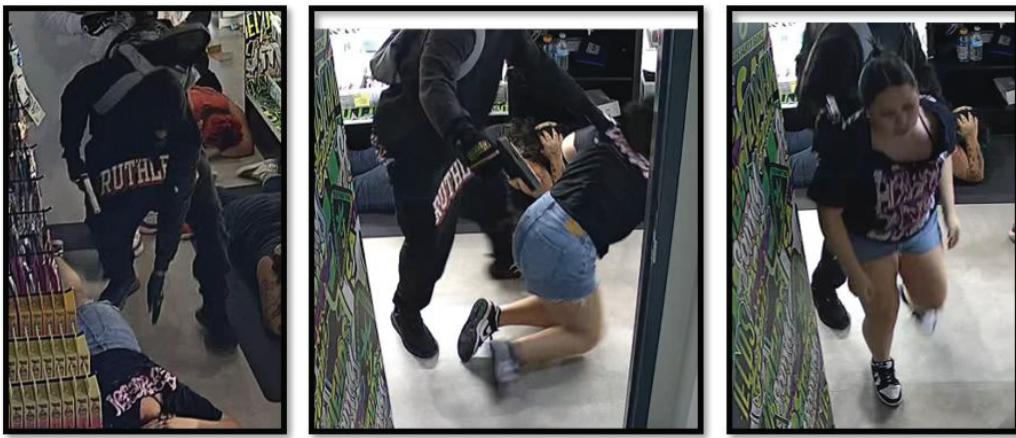


26. The unidentified suspect appeared to briefly search the two employees under his control, before leaving the showroom to look into the remaining rooms inside the dispensary.

CONTRERAS removed his firearm from the head of the employee on the floor and appeared to anxiously pace while watching all three employees behind the counter. WATSON reentered the showroom and discarded multiple cell phones to the floor before CONTRERAS began gesturing towards the product along the west display wall.

27. The unidentified suspect returned to the showroom as CONTRERAS was removing cash from a register just in front of the hallway leading to the back rooms of the dispensary. The unidentified suspect joined WATSON filling their respective backpacks with stolen merchandise before meeting up with

CONTRERAS. The unidentified suspect and CONTRERAS then appeared to be addressing one of the employees lying on the ground beneath them. WATSON then followed the unidentified suspect into a back room where the safe was located, before CONTRERAS pulled one of the victims up from the ground and forced her at gunpoint to move to the room with the safe. I have included several cropped surveillance screenshots below, capturing this movement:



28. As CONTRERAS moved the employee and passed her off to the unidentified suspect in the room with the safe, WATSON exited the room and quickly ran out toward the lobby. He returned with the employee who was originally seated behind the receptionist desk, moving her from the lobby to the showroom before passing her off to CONTRERAS, who made her join the others on the floor behind the counter.

29. About the same time, the unidentified suspect returned with the employee from the back room, directing her to the ground, before straddling her between his feet. WATSON moved to the room with the safe and was joined shortly thereafter by the

unidentified suspect. CONTRERAS remained in the showroom where he watched over the four employees while still grabbing merchandise.

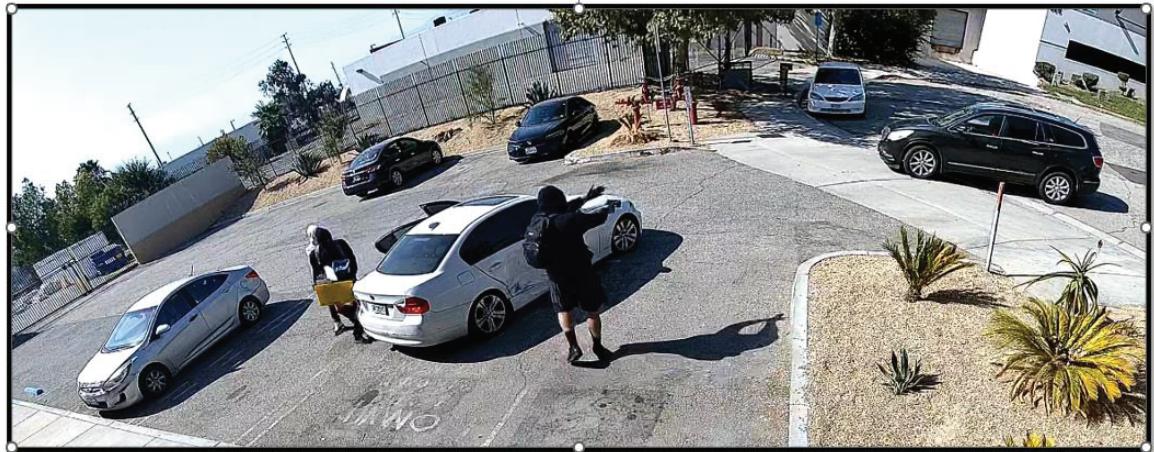
30. Approximately two minutes after the robbery suspects entered the showroom, WATSON pushed a large black safe from the back room into the showroom. He then pushed the safe across the showroom floor and out to the lobby. Leaving the safe just inside the dispensary's lobby doors, WATSON then briefly exited the dispensary to communicate with the getaway driver waiting in the BMW, opening the rear door on the driver's side and tossing in his black shark mouth backpack. WATSON then reentered the lobby, not even taking the time to close the car door.

31. While this was occurring, the unidentified suspect then joined CONTRERAS in looting a closet next to one of the display cases. The two suspects found the closet filled with merchandise, and CONTRERAS took a large yellow bin from inside the business to carry away the stolen product. WATSON then momentarily reappeared in the showroom, gesturing in a manner that suggested to me he was signaling for the other robbers to finish up. All three robbers then departed the showroom towards the lobby, as nearly three minutes had elapsed since the start of the robbery. The female employees remained face down on the floor behind the counter, with two of the young women reaching out to hold on to one another as the violent encounter concluded.

32. Outside, a witness from a nearby business recognized a robbery was in progress inside the dispensary. The witness

began recording with his cell phone, videoing the white BMW which was outside the front doors of the dispensary. The witness videoed the BMW as it moved back and forth in the lot several times throughout the robbery, before finally backing up and settling in about the same place as it had been at the start of the robbery, just out front of the dispensary doors. WATSON exited the dispensary followed by the unidentified suspect who was carrying the black safe. The two walked towards the awaiting BMW, just as two uninvolved vehicles entered the lot, both apparently unaware of the robbery in progress. The first vehicle, a small silver compact sedan, parked in a parking spot just a space or two west of the BMW. The second vehicle, a dark colored Buick SUV, came to a stop with its front axle just barely on the parking lot apron. WATSON escorted the unidentified suspect to the open rear driver's side door of the BMW sedan, before opening the driver's door and bending down just inside the door hinge, near the BMW's dash.

33. After unloading the safe into the back seat of the BMW, the unidentified suspect moved to the rear passenger side of the BMW. He then pulled out his pistol and pointed it at the silver sedan. He then transitioned and pointed the pistol in the direction of the Buick SUV. I have included a surveillance video screenshot below which captures this moment.



34. The unidentified suspect then walked to the front passenger door of the BMW as he gestured to the vehicles to get out of the way. WATSON then moved from the open driver's door to the now open trunk of the BMW, assisting CONTRERAS with the loading of the yellow container filled with stolen merchandise. WATSON then entered the backseat behind the driver as the unidentified suspect entered the front seat. Unable to fit the bin into the sedan's small trunk, CONTRERAS then dumped the remaining contents in the trunk and closed the trunk before moving to the open rear driver side door following WATSON. Before CONTRERAS was inside the vehicle, the BMW began to leave. WATSON was left scrambling to close the door, losing some merchandise to the asphalt below as the vehicle sped out of the parking lot. WATSON was only able to get the door closed once the vehicle was halfway down the street from the dispensary, still within view of the witness filming.

35. Once SBPD officers arrived, the female employee who was taken into the room with the safe said she was grabbed by one of the suspects. She stated she was ordered to show them where the safe was located, telling officers that one of the

suspect's held a gun to her head. She stated the suspects' stole her phone and an estimated \$500 in cash from the dispensary, but stated the safe was empty. Her phone was later recovered on a sidewalk approximately a mile south of the dispensary. Officers returned the phone to the victim.

B. Identification of the Robbery Vehicle

36. On August 12, 2024, I queried California Department of Motor Vehicles ("DMV") databases for the license plate 8ROM975, which was the plate displayed on the BMW used in the robbery. The registration was expired with the most recent DMV entry for the vehicle dating back to 2020. The entry showed the BMW being purchased by a buyer using a commercial strip mall address in Palmdale, California.

37. I then conducted a query of local license plate readers ("LPRs"). The BMW was recorded by a commercial LPR reader parked at the curb just in front of the residence located at 3854 Bluff St. in Perris, California on August 8, 2024, one day prior to the robbery. The vehicle was parked in the same spot on August 7th, then in the driveway of 3854 Bluff St. on August 6, August 5, and August 1, 2024.

38. Additionally, approximately an hour before the robbery on August 9, 2024, the BMW was recorded by a license plate reader traveling north in Perris, just 1.6 miles north of 3854 Bluff St. The vehicle was captured again by LPRs as it traveled north entering Moreno Valley at 3:20 p.m., approximately 5.6 miles north of the Bluff St. residence. Finally, at 3:37 p.m., approximately thirty minutes before the robbery, the BMW again

was scanned by LPRs on Reche Canyon Rd., a canyon road which acts as a freeway bypass shortcut between Moreno Valley and the south end of Colton, California. The BMW did not scan again on LPRs until 7:34 p.m., when it was recorded traveling through Moreno Valley.

C. Identification of the WATSON as a Robber

39. Law enforcement databases were queried using the 3854 Bluff St. address. The inquiries revealed the residence to be associated with WATSON, who was placed on parole with the California Department of Corrections and Rehabilitation ("CDCR") on June 1, 2024. WATSON's underlying parole charges include burglary and possessing a weapon as a prohibited person. CDCR databases revealed WATSON listed 3854 Bluff St. as his address of record, with WATSON also confirming cell phone number 909-633-1715 with CDCR on July 10, 2024.

40. WATSON's presence at 3854 Bluff St. was confirmed during the early morning hours of August 2, 2024, when just seven days before the robbery, officers with the San Diego Police Department ("SDPD") Special Operations Unit initiated a surround and call out operation at the residence. SDPD officers were there to arrest WATSON's younger brother, Keshawn Watson ("Keshawn"), who was wanted on a felony warrant out of the Superior Court of California, County of San Diego, for burglary and conspiracy. Both WATSON and his father, K.W.,¹ exited the

¹ The true identities of the witnesses and victims referred to in this affidavit are known to law enforcement. However, to maintain the integrity of the investigation and to prevent
(footnote cont'd on next page)

residence and were contacted by officers, being released on scene after Keshawn was taken into custody. I queried inmate records which revealed Keshawn was in the custody of the San Diego Sheriff's Department at the time of the dispensary robbery.

41. On August 13, 2024, I received recordings of jail calls associated with Keshawn's inmate account. I learned Keshawn remained in the custody of the San Diego County Sheriff's Office ("SBSO") following his arrest in Perris and requested calls from August 2 through August 13, 2024.

42. On August 15, 2024, I reviewed jail call recordings delivered by SBSO and recorded at the George Bailey Detention Center in San Diego, California. Two recordings were associated with 909-633-1715, the cell phone number WATSON listed with CDCR. Both of the recordings were on August 10, 2024, the day after the robbery.

43. The first call, recorded at 4:20 p.m., lasted only one minute and 38 seconds. No name prompt was requested at the onset of the call, however, I heard two younger male voices about 15 seconds into the call. After the subject on the receiving end of the call said "hello" the two males called each other names, before the subject on the receiving end of the call said, "I say that cause ah, you know ah, you know the little store n*gga probably came to in the Dino?" "Down near" The in-custody outbound caller interrupted, stating, "In the

witness/victim intimidation and to protect the privacy of the witnesses, I have not included full legal names in this affidavit.

Dino?" "Oh yeah." The subject on the receiving end of the call then said something which sounded like, "I brought Esco up." "I brought Esco's punk ass here." The outbound caller sounded confused, replying, "You say you brought him here?" The subject on the receiving end of the call then said, "I'm trying to find a fit before tomorrow," but without providing further context. The term "Dino" is a popular slang term for the City of San Bernardino.

44. A second call, occurring at 8:55 p.m., lasted nearly 15 minutes. At the start of the call, just after the automated prompt, one subject on the call stated "Keshaun Watson" which spurred the subject on the other end of the call to say, "Kenyon Watson, what's up blood." Based on the account and the totality of the two calls, it appeared the outbound call was from Keshaun and the recipient of the call was his older brother, WATSON. The two brothers then discussed Keshaun's pending criminal case, before the Keshaun asked his brother where he was. WATSON replied, "We're out here at the room with Esco's punk ass." A little bit later, the male subject on the receiving end of the call stated, "N*gga, why is it like as soon as you go to jail n*ggas, n*ggas" Before the subject could finish, he was interrupted by Keshaun, who said, "Always do something and when I come out there ain't shit going on."

45. When one of the subjects on the call explained a lack of engagement with Keshaun due to being high, Keshaun angrily replied, "Bitch, what the fuck that got to do with me?" "Do I give a fuck about some weed right now?" Later in the call, it

sounded like Keshawn asked his brother if he was happy. WATSON replied, "Yeah I am buzzed, (unintelligible) it's crazy right now," which Keshawn responded, "Yeah cuz, N*gga you did just say some federal shit." Kenyon replied, "Yeah, I ain't lying."

46. On August 22, 2024, a search warrant was sent to Verizon Wireless for the call detail records, advance timing report, and GPS locations associated with WATSON'S cellphone number of 909-633-1715. The warrant was authored by SBPD Officer B. Keil and approved by the Honorable Judge Tara Reilly of the Superior Court of California, County of San Bernardino.

47. On August 26, 2024, I reviewed the requested records returned from Verizon Wireless. I examined data and saw a 30 second incoming call to WATSON's phone which occurred at 4:26 p.m., about 20 minutes after the robbery. During the call, WATSON's cell phone connected with a cell phone tower just over a mile southwest of the dispensary.

48. Also on the day of the robbery, WATSON's cell phone received a call from 909-745-0929, a number which later investigation would reveal belonged to CONTRERAS. The call occurred at 2:48 p.m., 90 minutes prior to the robbery, and lasting less than two minutes. Then at 2:54 p.m., WATSON called CONTRERAS's number, with the call ending just under a minute.

D. Identification of the CONTRERAS as a Robber

49. I queried law enforcement databases using the number which communicated with WATSON before the robbery, namely 909-745-0929. I learned the phone number to be associated to CONTRERAS, who was on parole with CDCR for a felony robbery. I

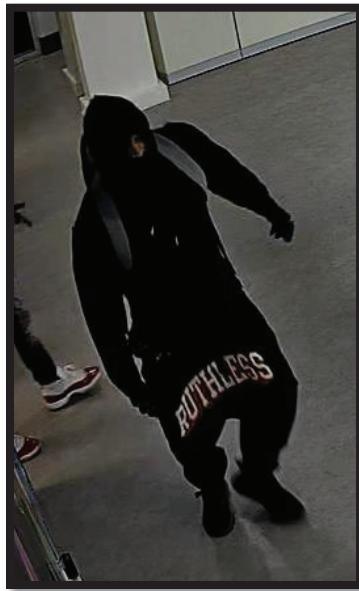
learned CONTRERAS listed the phone number which was used to communicate with WATSON during a contact with CDCR on June 24, 2024.

50. On August 26, 2024, while examining CONTRERAS' criminal history, I saw he was booked by the Colton Police Department ("CPD") on August 23, 2024, being charged with home invasion robbery, carjacking, sex with a foreign object with the threat of retaliation, assault with a deadly weapon, and evading a peace officer with a disregard for safety. I contacted Det. T. Jaeger from CPD who was familiar with CONTRERAS' arrest.

51. I learned that around 11:00 p.m. on August 22, 2024, three masked men armed with pistols forced their way into a victim's apartment while she was sleeping, pistol whipping the victim and telling her they heard her apartment was where drugs, guns, and money was located. One of the subjects took the victim into the bathroom, tied her up, and sexually assaulted her while the others ransacked the apartment, ripping up mattresses and the seat cushions. The suspects stole the victim's vehicle, and at approximately 1:30 a.m. on August 23, 2024, CONTRERAS was spotted driving the victim's stolen vehicle in Yucaipa, California. San Bernardino County Sheriff's Department deputies initiated a stop of the vehicle, but CONTRERAS failed to yield, leading officers on a wild, extended pursuit, before CONTRERAS crashed into a CPD patrol unit which had taken over the pursuit once it neared their city. After colliding, CONTRERAS ran from the wrecked vehicle. While

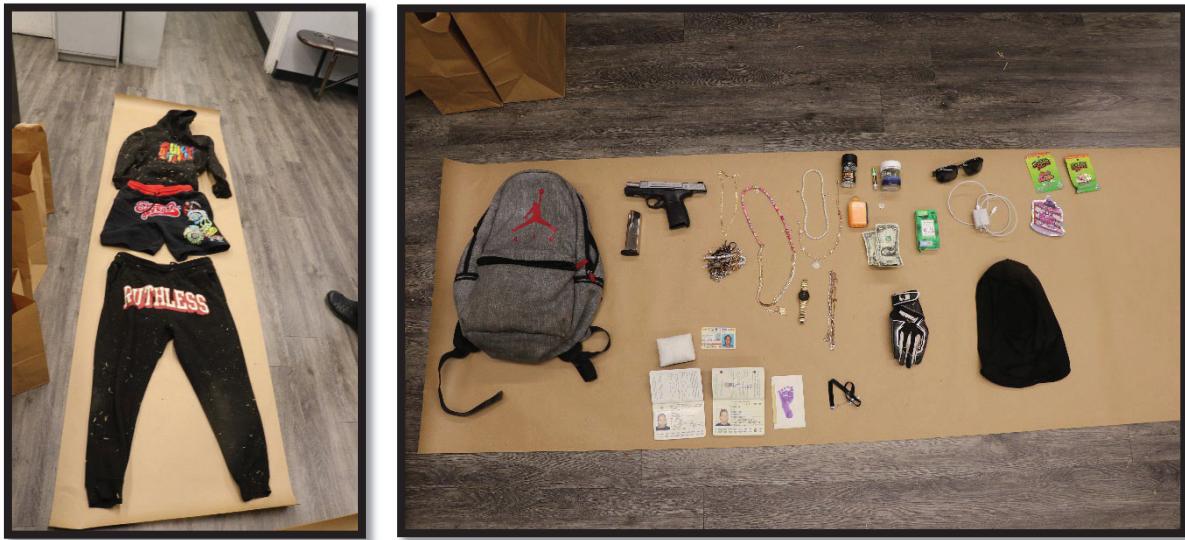
fleeing, CONTRERAS discarded a grey Nike backpack which was recovered and found to contain a loaded silver and black pistol.

52. I asked Det. Jaeger to provide me photographs of clothing and contraband taken into custody during CONTRERAS' arrest. I examined the photos provided by Det. Jaeger and observed CONTRERAS' black sweat pants matched the "RUTHLESS" branded pants seen during the dispensary robbery. Additionally, the grey backpack with the red Nike Air Jordan logo matched the backpack CONTRERAS used during the robbery. Included below are two surveillance screenshots of CONTRERAS from the robbery, wearing the "RUTHLESS" pants and in possession of the backpack.



53. For comparison, I have included a photo below of the clothing taken off CONTRERAS by CPD following his arrest on August 23, 2024. I have also included a photo of the backpack which contained the firearm, as well as other evidence, including a Franklin batting glove, commercially sold marijuana

product, and a black ski mask taken into custody by CPD during CONTRERAS' arrest.



E. CONTRERAS' Firearm and Tattoos Match Those Seen the Robbery

54. On September 3, 2024, I traveled to CPD to examine the evidence taken into custody during CONTRERAS' arrest. I examined the Smith and Wesson model SD40 VE .40 caliber pistol displaying serial number FDD4611 which was found to contain 11 rounds of .40 caliber ammunition at the time of recovery. I confirmed with ATF SA Paul Kirwan, an interstate nexus expert, that the SD40 VE model pistol is not manufactured in California.

55. Prior to this investigation I have had numerous encounters with this model of firearm, which is marketed as Smith and Wesson's entry level offering in their polymer framed pistol lineup. The name brand weapon's reliability combined with its low price point has made it popular among firearms traffickers and the criminal element. The weapon is chambered

in both 9mm and .40 caliber and includes notable external features which are commonly visible on surveillance video recovered during violent crime investigations. These identifiable features go beyond the model's somewhat recognizable silver slide and black color. The model's forward and rear serrations on the slide of the weapon are distinct, as is the shape of the trigger guard and the contrasting black extractor.

56. Based on my examination of the physical features visible on the weapon in CONTRERAS' hands during the dispensary robbery, I believe the weapon used by CONTRERAS during the robbery is a Smith and Wesson SD series pistol, the same make and model as the weapon recovered during CONTRERAS' arrest.

57. While at CPD, I received additional photos which documented the entirety of their investigation into the home invasion, concluding with CONTRERAS arrest. I compared visible tattoos in a series of photos CPD took of CONTRERAS in a sleeveless undershirt the night he was arrested. The tattoos visible on CONTRERAS left arm and wrist appeared similar in color and location to partial tattoos visible on CONTRERAS during the robbery of the dispensary.

F. As of August 2024, CONTRERAS Was on Parole After a Felony Robbery Conviction and is Prohibited from Possessing Firearms

58. On September 4, 2024, I reviewed a criminal history report for CONTRERAS as well as online court databases from the Superior Court of California, Counties of San Bernardino and Riverside. I learned CONTRERAS he has been convicted of

at least four felony crimes, including a conviction for robbery in 2018 for which he was sentenced to seven years in prison in the Superior Court for the State of California, County of San Bernardino, case number FSB17004642.

G. WATSON's Instagram Displays Ties to the BMW and Robbery Clothing

59. On August 21, 2024, I reviewed a Riverside Police Department ("RPD") report documenting the April 12, 2023, probation search of a Moreno Valley residence belonging to WATSON and his brother Keshawn, resulting in the location and seizure of two firearms, one from each brother's bedroom.

60. Following the review of the report, I learned RPD Officer N. Vargas was responsible for investigating and apprehending WATSON following the location of the firearm. I learned during the Officer Vargas' investigation; an Instagram account utilized by WATSON was identified. The Instagram account utilized username k2sumsicc and user ID 5741758140.

61. I examined the account which was set to private, having no publicly viewable photos or videos. On the profile picture, a cartoon brain was set to a plain black background. In a thought bubble a male subject appeared to be running towards a stack of cash with attached angel wings. The display name showed "EBK 💯," a common street and social media abbreviation meaning "everybody killer."

62. On August 22, 2024, a search warrant for the Instagram account believed to be operated or controlled by WATSON was authored by Officer Keil and approved by the

Honorable Judge Michael A. Smith of the Superior Court of California, County of San Bernardino. Instagram account requested content from June 1, 2024, through the signing date of the search warrant.

64. On August 27, 2024, I reviewed the return of content for WATSON's Instagram account returned by Meta Platforms, Inc. in response to the search warrant. During my review, I located dozens of photos and selfie style videos of WATSON, including some which appeared to be from the driver's seat of an early 2000s BMW sedan. I also located multiple photos of shoes identical to those worn by WATSON during the robbery, as well a matching shark mouth backpack which was visible through the shattered rear window of WATSON's BMW. In a photo posted as story on August 7, 2024, two days before the robbery, the distinct white high top Nike Air Jordan sneakers were visible laced up on the feet of the person who took the photo, with the background appearing to be inside a hotel room.

65. Additional content posted to WATSON's Instagram account in the days immediately following the robbery showed WATSON in possession of cash and merchandise similar to what would have been found inside the dispensary. In a story posted on August 10, 2024, cash was set on WATSON's lap next to a small package of commercially packaged marijuana visible just out of frame. Across the photo was the words "I made dis today wtfk uk

doing." In a video story posted to the account on August 11, 2024, more marijuana merchandise appeared to be offered for sale, with the video panning around a box full of unopened product set inside a vehicle which matched the interior of an early 2000s 3 series BMW sedan. Visible across the screen while the video played were the words "If uk see anything uk want tapn" and "Everything 25." Two of the marijuana branded items visible in the story were identical to the items seized from CONTRERAS during his arrest by CPD more than a week later.

H. CONTRERAS Instagram Yields Further Robbery Evidence

66. I also located an Instagram account I believed to operated or controlled by CONTRERAS, which was set to private and with only one publicly displayed photo for viewing. The account, bearing username "crim.called_halo," user ID 16404398818, and the display name Tyrie Skavage Contreras, featured a single profile photo with a subject who appeared to be a black male adult with his back to the camera. The subject in the photo had a close beard and short hair, with a build and jaw line which appeared to match prior booking photos of CONTRERAS. The display name featured the word "Skavage" between CONTRERAS' first and last name, similar to the "Young Savage" moniker which was on file in CDCR parole records for CONTRERAS.

67. On August 27, 2024, a search warrant for CONTRERAS Instagram account was authored by Officer Keil. The warrant requested content from June 1, 2024, through the signing date.

The warrant was approved by the Honorable Judge Michael Libutti of the Superior Court of California, County of San Bernardino.

68. On August 29, 2024, I reviewed the return of content for CONTRERAS' Instagram account. During my review, I located multiple photos sent from CONTRERAS' account to another user on August 7, 2024. In the first photo, CONTRERAS appeared pictured in the back seat of sedan with his ski mask on, cash in his hand, and a weapon resembling a Smith and Wesson SD series pistol on his lap. In another photo, a shirtless CONTRERAS is pictured in a bedroom with an AR type rifle pointed towards the camera. In the background of the photo are black shoes similar to the style worn by CONTRERAS during the robbery.

69. In a message sent to another user at 10:31 p.m. on August 9, 2024, just over six hours after the robbery, CONTRERAS account wrote, "My bad bro that shyt was trash we hit for a safe tht was new wit nothin in it." The other user responded with a voice message chastising CONTRERAS for hitting the dispensary too early in the day. The other user said it was too early in the weekend to be successful, citing his own experience working security in a dispensary.

I. Interstate Commerce

70. Based on training and experience, including the collective knowledge of other law enforcement officers which has been shared with me, I have learned controlled substances, such as marijuana, travel in and have an effect on interstate and foreign commerce. Also, after consulting with the Assistant United States Attorney assigned to this investigation, I

understand that the Supreme Court has stated that "if the Government proves beyond a reasonable doubt that a robber targeted a marijuana dealer's drugs or illegal proceeds, the Government has proved beyond a reasonable doubt that commerce over which the United States has jurisdiction was affected." *Taylor v. United States*, 136 S. Ct. 2074, 2080-81 (2016). In this case, because the robbers targeted a federally controlled substance, the interstate commerce element for a Hobbs Act Robbery is satisfied.

CONCLUSION

71. For all of the reasons described above, there is probable cause to believe that Tyrie CONTRERAS committed violations of 18 U.S.C. §§ 1951(a) (Interference with Commerce by Robbery); 924(c) (Use, Carry, or Brandish a Firearm in Furtherance of a Crime of Violence); and 922(g)(1) (Felon in Possession of a Firearm) and Kenyon WATSON committed a violation of 18 U.S.C. §§ 1951(a) (Interference with Commerce by Robbery).

Attested to by the applicant, ATF
SA Jarrett Keegan, in accordance
with the requirements of Fed. R.
Crim. P. 4.1 by telephone on this
4th day of September, 2024.



UNITED STATES MAGISTRATE JUDGE